

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
)
SHAWN ESTEP and) CASE NO. 13-13223-JMC-13
JENNIFER ESTEP,)
)
)
)
DEBTORS.)

OBJECTION TO MOTION TO TERMINATE AUTOMATIC STAY

Come now the Debtors, by counsel, and in support of this Objection to Motion to Terminate Automatic Stay filed by OneWest Bank, N.A., (“Creditor”) and state the following:

1. On December 24, 2013, the above-captioned Debtors commenced the proceeding under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtors’ Chapter 13 Plan base was confirmed on March 18, 2014.
3. Debtors intend to obtain financing to satisfy the outstanding mortgage held by Creditor.
4. For the foregoing reasons, the Motion to Terminate Automatic Stay filed by OneWest Bank, N.A should be denied.

WHEREFORE, the Debtors Object to the Motion to Terminate Automatic Stay filed by OneWest Bank, N.A (“Creditor”) and requests all other relief just and proper in the premises.

Respectfully Submitted,

/s/ Mark S. Zuckerberg
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing pleading was served by ECF noticing, this 31st day of July, 2015.

U.S. Trustee

Chapter 13 Trustee

Gerner & Kearns Co., LPG

Patricia L. Johnson, Counsel for Creditor

/s/ Mark S. Zuckerberg

Mark S. Zuckerberg